

MARY DRYOVAGE (SBN 112551)
Law Offices of Mary Dryovage

351 California Street, Suite 700
San Francisco, CA 94104
Telephone: (415) 593-0095
Email: mdryovage@igc.org

WENDY MUSELL (SBN 203507)
Stewart & Musell

351 California Street, Suite 700
San Francisco, CA 94104
Telephone: (415) 593-0083
Fax: (415) 520-0920
Email: wmusell@stewartandmusell.com

Attorneys for Plaintiff

MELINDA L. HAAG (SBN: 132612)
United States Attorney
ALEX G. TSE (152348)
Chief, Civil Division
JUAN D. WALKER (SBN 208008)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-6915
FAX: (415) 436-6748
Email: juan.walker@usdoj.gov

Attorney for Federal Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LAN T. LIU,

Plaintiff,

v.

MICHAEL J. ASTRUE, SECRETARY
SOCIAL SECURITY ADMINISTRATION,

Defendant.

Case No. C-11-6120 (JSC)

**STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING DISCOVERY AND
MOTION TO COMPEL DISCOVERY**

STIPULATION AND [PROPOSED] ORDER REGARDING DISCOVERY AND MOTION TO COMPEL
DISCOVERY

Liu v. Astrue, Case No. C-11-6120 (JSC)

Page 1

1 WHEREAS, the close of discovery in the above titled matter was October 15, 2012, and
2 motions to compel discovery are currently due by October 25, 2012;

3 WHEREAS the legal counsel for the parties have met in person for meet and confer
4 regarding outstanding discovery issues in an effort to resolve and/or limit the remaining
5 discovery disputes between the parties, LAN T. LIU, Plaintiff and MICHAEL J. ASTRUE,
6 COMMISSIONER OF SOCIAL SECURITY, Defendant (hereinafter "Parties"), request the
7 following relief by the Court.

8 (1) Defendant agrees to amend the following responses to Plaintiff's Request for
9 Production of Documents, Set One: 6, and 9;

10 (2) Defendant agrees to amend/reevaluate the following responses to Plaintiff's
11 Request for Production of Documents, Set One: 7, and 12;

12 (3) Defendant agrees to reevaluate the following responses to Plaintiff's Request for
13 Production of Documents, Set Two to determine if a supplement will be provided: 1;

14 (4) Defendant agrees to amend the following responses to Plaintiff's Interrogatory
15 Requests, Set One: 1, (requests nos. 3, 4, 5, 6 incorporate by reference request No. 1), 7, 8, and
16 13;

17 (5) Defendant agrees to amend the following responses to Plaintiff's Request for
18 Admissions, Set One: 6, and 10;

19 (6) Defendant agrees to reevaluate the following responses to Plaintiff's Request for
20 Admissions, Set One to determine if a supplement will be provided: 12 and 20;

21 (7) Defendant agrees to provide a privilege log;

22 (8) Defendant agrees to provide verifications for each of its interrogatory responses;

23 (9) Plaintiff agrees to supplement Defendant's Request for Interrogatories Nos. 9 and
24 10;

(10) Plaintiff agrees to reevaluate the following responses to Defendant's Interrogatory Requests, Set One to determine if a supplement will be provided: 2, 3, 4, and 8;

(11) Agreement could not be reached regarding Plaintiff's Interrogatory Requests Nos. 10-25 and Plaintiff's Request for Production of Documents, Set One Request Nos. 4, 8, and 10, and the parties anticipate they will be the subject of a motion to compel/ request for additional discovery as it relates to these requests;

(12) Both parties will provide supplemental responses by November 7, 2012;

(13) The parties will meet and confer regarding these supplemental responses by November 14, 2012; and

~~(14) Any motion to compel regarding the above requests is due to the Court by November 28, 2012.~~

Any discovery dispute shall be brought in accordance with this Court's Standing Order on or before November 28, 2012.

Dated: October 24, 2012

/s/ electronic signature authorized
MARY DRYOVAGE
Law Offices of Mary Dryovage

Dated: October 24, 2012

/s/ electronic signature authorized
WENDY MUSELL
Stewart & Musell, LLP

Attorneys for Plaintiff

Dated: October 24, 2012

MELINDA L. HAAG
United States Attorney

/s/ electronic signature

JUAN D. WALKER
Assistant United States Attorney
Attorneys for Federal Defendant

1 IT IS SO ORDERED.

2
3 Dated: October 25, 2012


4 JACQUELINE SCOTT CORLEY
UNITED STATES MAGISTRATE JUDGE